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June 13, 2014

VIA ECF AND FEDERAL EXPRESS

**REQUEST FOR
ORAL ARGUMENT**

Honorable Pamela K. Chen
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Pall Corporation v. 3M Purification Inc.*, Nos. 9:97-cv-07599-PKC-WDW and 2:03-cv-00092-PKC-WDW

Dear Judge Chen:

We represent Defendant 3M Purification Inc. ("3MPI") in the above-referenced matter. We request oral argument on 3MPI's Motion for Summary Judgment (D.I. 397), as well as in response to Pall Corporation's ("Pall") Motion for Summary Judgment (D.I. 389). Both summary judgment motions were fully briefed and filed with the Court today.

We also write to confirm that 3MPI filed today, and include herewith courtesy copies of, the following motion papers:

3MPI's Motion for Summary Judgment of (1) No Willful Infringement, (2) Non-Infringement, and (3) No Lost Profits:

- 3MPI's Opening papers, including: (1) Notice of 3M Purification Inc.'s Motion for Summary Judgment; (2) Memorandum in Support of 3M Purification Inc.'s Motion for Summary Judgment; (3) Declaration of Gina M. Bassi in Support of 3M Purification Inc.'s Motion for Summary Judgment; (4) Rule 56.1 Statement of Undisputed Material Facts in Support of 3M Purification Inc.'s Motion for Summary Judgment; and (5) Certificate of Service.
- 3MPI's Reply papers, including: (1) 3MPI's Reply Memorandum in Support of Motion for Summary Judgment; (2) Reply Declaration of Gina M. Bassi in Support of 3M Purification Inc.'s Motion for Summary Judgment; (3) 3MPI's Reply Rule 56.1 Statement in Response to Pall's Response to 3MPI's Statement of Undisputed Facts and 3MPI's Response to Pall's Counterstatement of Material Facts as to Which There is No Genuine Issue; and (4) Certificate of Service.



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**3MPI's Opposition to Pall Corp.'s Motion for Summary Judgment on Inequitable Conduct
Defenses and Counterclaims**

- 3MPI's Opposition papers, including: (1) Memorandum of Law in Opposition to Pall Corporation's Motion for Summary Judgment; (2) Declaration of Gina M. Bassi in Support of 3M Purification Inc.'s Opposition to Pall Corporation's Motion for Summary Judgment; (3) Response to Pall Corporation's Rule 56.1 Statement in Support of Motion for Summary Judgment and Counterstatement of Additional Material facts; and (4) Certificate of Service.

We are available at the Court's convenience to discuss any questions.

Respectfully submitted,

/s/ Thomas M. Crispi

Thomas M. Crispi

Encl.

cc: All counsel of record (via ECF, without enclosures)